



LINDA WONG
Member of NJ, PA, NY, VA, GA and DC Bars

lwong@wongfleming.com

December 23, 2024

VIA ECF

The Honorable Georgette Castner, U.S.D.J.
U.S. District Court for the District of New Jersey
Clarkson S. Fisher Building and U.S. Courthouse
402 East State Street
Trenton, New Jersey, 08608

Re: Jane Doe v. Princeton University, Case No.: 3:21-cv-20264-GC-JTQ
Application for Leave to File Dispositive Motions

Dear Judge Castner:

This law firm, along with Crowell & Moring LLP, represents Defendant The Trustees of Princeton University (the “University”)¹ in the above-captioned case. Pursuant to the Magistrate Judge’s recent order regarding the close of discovery and next steps in this case (ECF No. 56), the University and Plaintiff Jane Doe (collectively, the “Parties”) respectfully jointly request that this Court amend the Pretrial Scheduling Order (ECF No. 43) to include a summary judgment briefing schedule.

Fact discovery concluded in this matter on October 25, 2024,² *see* ECF No. 43 at § III.8, and the Magistrate Judge thereafter held a status conference and then issued an order directing the parties to submit to the Court a schedule governing dispositive motions practice. *See* ECF No. 56. The Parties have conferred and agreed upon the following proposed schedule:

- Letters for leave to file dispositive motions: January 10, 2025
- Any opposition letters: January 22, 2025
- Opening briefs: February 28, 2025

¹ Jane Doe’s Complaint is against “Princeton University.” The proper party for actions involving the University, however, is “The Trustees of Princeton University.”

² The Magistrate Judge deferred ruling on whether to extend expert discovery deadlines until after resolution of the Parties’ summary judgment motions based on the Parties’ statements that expert reports were not necessary for those motions. *See* ECF No. 56.

821 ALEXANDER ROAD, SUITE 200 • P.O. BOX 3663 • PRINCETON, NJ 08543-3663
TEL: (609) 951-9520 • FAX: (609) 951-0270
WWW.WONGFLEMING.COM

CALIFORNIA • FLORIDA • GEORGIA • ILLINOIS • INDIANA • MICHIGAN
NEW JERSEY • NEW YORK • PENNSYLVANIA • TENNESSEE • TEXAS • WASHINGTON

ATTORNEYS ADMITTED SOLELY IN THE JURISDICTION WHERE LISTED OFFICE IS LOCATED, UNLESS OTHERWISE NOTED



- Opposition briefs: April 14, 2025
- Reply briefs: May 16, 2025

The Parties now request that this Court amend the Pretrial Scheduling Order (ECF No. 43) to reflect this proposed schedule for requesting leave to file and then briefing on summary judgment.

Thank you for Your Honor's consideration in this regard.

Respectfully submitted,

For Defendant:

WONG FLEMING

/s/ Linda Wong
Linda Wong, Esq.
821 Alexander Road, Suite 200
Princeton, NJ 08540
lwong@wongfleming.com

CROWELL & MORING LLP

/s/ Amanda Shafer Berman
Amanda Shafer Berman, Esq. (*pro hac vice*)
Eli Berns-Zieve, Esq. (*pro hac vice*)
1001 Pennsylvania Ave., N.W.
Washington, D.C., 20004
aberman@crowell.com
eberns-zieve@crowell.com

For Plaintiff:

SCHALL & BARASCH, L.L.C.

/s/ Patricia Barasch
Patricia Barasch, Esq.
Moorestown Office Center
110 Marter Ave., Suite 105
Moorestown, NJ 08057
pbarasch@schallandbarasch.com